

COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

**BOSTON GAS COMPANY d/b/a KEYSPAN ENERGY  
DELIVERY NEW ENGLAND**

**D.T.E. 03-40**

ATTORNEY GENERAL'S TWENTY SECOND SET OF  
DOCUMENT AND INFORMATION REQUESTS

- AG 22-1 Please refer to Exh. KEDNE/JFB-1, p. 11. Please provide any and all documentation, both internal and external, that describes the CRIS system. Please provide examples of written communication with customers describing the account management services.
- AG 22-2 Please refer to Exh. KEDNE/JFB-1, p. 11. How many customers participate in the account management programs offered by the Company.
- AG 22-3 Please provide copies of any and all records regarding customer complaints regarding the Company's internet account management services.
- AG 22- 4 Please provide copies of any and all records regarding customer education and awareness of the Company's internet account management services.
- AG 22- 5 Please provide a breakdown by customer class and demographic information of the number of customers who pay their bills through the website.
- AG 22- 6 Please refer to Exh. KEDNE/JFB-1, p. 12. Please describe in detail and provide copies of the written contracts with researchers and research results of any and all research and development programs in the natural gas distribution industry. Please identify and any and all costs associated with such research.
- AG 22- 7 Please refer to Exh. KEDNE/JFB-1, p. 12. Please provide the exact wording of the "Weather Normalization Clause." Please describe in detail how the Weather Normalization Clause would "stabilize customer bill impacts in colder-than-normal

weather periods.” Provide an example of a bill impact of a typical winter heating season customer in a colder-than-normal weather period.

- AG 22-8      How would the Weather Normalization Clause impact a customer bill in a normal weather period. Provide an example of a bill impact of a typical winter heating season customer in a normal weather period.
- AG 22-9      Please provide any and all documentation, including all internal and external communication regarding any studies or information that quantifies the benefits, if any, for Company customers of the CRIS system and any account management services.
- AG 22-10     Please refer to Exh. KEDNE/JFB-1, p. 12. Please provide any and all documentation regarding the energy efficiency measures targeted to low income customers. How are low income customers defined and target. How many customers receive these targeted funds. How are these funds spent.
- AG 22-11     Please refer to Exh. KEDNE/JFB-1, p. 13. Please provide copies of any and all documentation regarding development, implementation and evaluation of the On Track Program. Does the Company intend to implement the same or a similar program in Massachusetts. If so, please provide any and all information and documentation of how the program will work. If not, why not.
- AG 22-12     Please provide any and all documentation regarding the costs associated with the On Track Program in New York and the potential costs of a similar program in Massachusetts. How many employees are dedicated toward development and management of the program? What indicators does the Company use to measure the success or failure of the program.
- AG 22-13     Please refer to Exh. KEDNE/PJM-3. Please provide a copy of any ancillary documents that affect the agreement and copies of all written correspondence regarding the agreement.
- AG 22-14     Please refer to the Company’s response to AG-1-44. As requested, please provide the number of KeySpan and Company employees by month for the years 1997 through 2003 by employee group (e.g. union, clerical, management).
- AG 22-15     Please provide copies of all materials, reports, workpapers, internal and external communications, documents filed with the Department, and responses to any and all information requests regarding Service Quality during the period in which the D.T.E. 96-50 PBR has been in effect.

- AG 22-16 Please provide copies of all materials, reports, workpapers, internal and external communications, documents filed with the Department, and responses to any an all information requests regarding Service Quality during the test year and 2003.
- AG 22-17 Please describe any and all efforts the Company has undertaken to educate the public about reporting gas leaks. Please provide copies of any and all documents, including but not limited to, mailings and bill stuffers, the Company uses to communicate with the public.
- AG 22-18 Please provide the number and classification of all gas leaks during the test year. Please provide copies of any and all company documentation and training materials regarding gas leak classification.
- AG 22-19 For the years 2001, 2002 and 2003, please provide a list of all the phone numbers made available by the Company, Keyspan and Keyspan Services to customers and prospective customers of any type in the Company's service territory. For each phone number, explain all of the options available and whether a live representative or an automated voice service initially answers the call.

Date: June 10, 2003